



# **VERSOVA MANAGEMENT COOPERATIVE CODE OF BUSINESS CONDUCT**

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**February 2026**



## LETTER FROM JT DEAN, PRESIDENT



Dear Partners,

Versova Management Cooperative and its members are committed to doing business aligned with our core values. These values guide us in every business decision, client relationship, and our overall strategic direction.

Our teams align their actions each day with our core values:

- Continuous improvement
- Efficiency
- Execution
- Quality and compliance
- Servant leadership
- Stewardship

In turn, their actions ensure consistency and alignment with Versova's goal to be the most trusted and respected egg company in the United States. We want to be known for our people, our partnerships, and our product integrity.

As we focus on the future and the continued need to provide high-quality protein for a growing world, each of us has an opportunity and responsibility to take ownership in how Versova represents itself and conducts business aligned with our goals.

Our actions not only impact us, they also affect our customers, the communities where we work, our business partners, and our colleagues. Versova and its suppliers, vendors, contractors, customers, and business partners are all responsible for ensuring that integrity and ethical business conduct are at the forefront of our actions and relationships.

This document cannot address every situation that we may encounter in our complex business. Yet how we do business matters, regardless of the situations we encounter. Making ethical business decisions in everything we do sits at the heart of our core values and is key to our continued success.

Thank you for upholding these values, as we continue to make Versova a place where business is done with integrity and purpose—a place where we all are proud to work.

Sincerely,

A handwritten signature in black ink that reads "James T. Dean". The signature is fluid and cursive, written in a professional style.

**JT Dean** | President

## PURPOSE

The purpose of this document is to compile portions of the Versova employee handbook policies into a guidance document outlining positions on ethics, integrity, and business conduct that are expected from the company and business partners to follow. As it applies to Versova, this document does not supersede our employee handbook, and the additional detail applicable to Versova's employees in that handbook continue to apply. This document is merely a guide to be shared with vendors, customers, contractors, and other third-party business partners who are expected to generally follow these same principles.

At the heart of this document is an expectation that each individual consider how decision-making and actions impact the company's credibility and reputation. That, as individuals and business partners of Versova, each person must demonstrate good business judgment, sound ethical principles, and generally follow the minimum standards outlined herein.

### **Policy Owner**

General counsel is responsible for both content and oversight of this policy.



## ETHICAL BUSINESS CONDUCT

### We uphold the law

Versova's commitment to integrity begins with complying with laws, rules, and regulations applicable to the business. No person shall engage in conduct or activity that may raise questions as to Versova's honesty, integrity, reputation or otherwise cause embarrassment to Versova. We do not engage in corruption and do not offer or pay bribes to facilitate business and we do not conduct business with those who do. In addition, as part of working in our industry, it is imperative that we at all times comply with food safety standards and procedures and will at all times act to promote and achieve food safety and regulatory compliance.

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### We recognize and manage conflicts of interest

Part of ethical business conduct is avoiding real and potential conflicts of interests. A conflict of interest is defined as an action or actions based on interests other than those of Versova, or when an individual's personal economic interest is in conflict with the actions of the company. Some examples of situations to be avoided are acceptance of gifts, loans, or excessive entertainment from suppliers, customers, or others dealing with the company; the use of privileged information; or the use of company position for personal gain.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, it should be clearly elevated as a concern and managed for resolution.

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### We recognize when business courtesies are not appropriate

Versova is committed to competing and making procurement decisions solely on the merit of products and services. Individuals should avoid any actions that create a perception that favorable treatment was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Versova does or may do business. It is not permitted to give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Versova or customers. Certain business courtesies may be generally acceptable, things like occasional meals, refreshments, and entertainment that are not inappropriately lavish or excessive; non-monetary gifts such as: flowers, fruit baskets, modest presents that commemorate a special occasion; gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising, or promotional items). Generally, no Versova employee may accept compensation, honoraria, or money of any amount from entities with whom Versova does or may do business.

## **We value accurate recordkeeping**

It is imperative that all corporate records of Versova and its business partners be true, accurate and complete, in accordance with applicable accounting principles. It is inappropriate to improperly influence, manipulate, or mislead any audit of books, records, processes, controls or business practices.

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## **We believe in fair competition**

Versova is dedicated to ethical, fair, and vigorous competition. Versova products are sold based on their merit, superior quality, customer service, and competitive pricing. Versova will make independent pricing and marketing decisions and will not improperly cooperate or coordinate activities with competitors. Further, the company will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for the sales of its products, nor engage or assist in unlawful boycotts of customers. Further, Versova will not acquire or seek to acquire by improper means a competitor's trade secrets or other proprietary or confidential information.

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## **We respect and protect confidential information**

Information concerning the business affairs of Versova; its trade secrets or information relating to its plans, products, processes, protocols, know-how, designs, formulas, test-data, marketing data, accounting, pricing information, business plans and strategies, negotiations and contracts, inventions and discoveries or machines and mechanical devices; employees' private or personal identifiable information; its customers and vendors; and its competitive advantages are always to be treated as confidential and proprietary. This is also true of our business partners.

Disclosing confidential information to persons or entities not entitled to such information, or who do not need to know such information for the performance of their job or assisting any person to gain unauthorized access to company records or processes or procedures is a violation of confidentiality.

The communication of false or derogatory information about Versova or its employees; and the taking of photographs inside any Versova facility, except with management authorization, is also not tolerated.

Further, confidential information of or about another company including any information obtained from another company pursuant to a non-disclosure agreement must be kept confidential and only used for the purposes for which such information was received. Any unauthorized disclosure or misuse of such information is a violation of this policy.

## **0 We believe in accountability and in reporting violations**

If an employee or business partner is uncertain about a situation or any rule, is concerned about whether standards are being met, or is aware of any other serious issues, they must contact Versova management.

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## **0 We believe in human rights**

Versova has a set of core values that include respecting and serving our employees, business partners, customers, and communities while being stewards of our hens and the environment. Versova complies with all state and federal laws and generally with international treaties concerning human rights, social rights, and labor rights, consistent with the principles of the United Nations Universal Declaration of Human Rights. Versova seeks to do business with customers, suppliers, contract labor service providers, and contractors who share this same commitment to human rights and working conditions.

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## **0 We are a committed Equal Opportunity Employer**

Versova is an equal opportunity employer. As such, we prohibit discrimination based on race, color, creed, religion, sex, national origin, ancestry, age, disability, military status, veteran status, marital or family status, pregnancy, genetic information, citizenship status, sexual orientation, gender identity or expression, or any other reason prohibited by applicable law.

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## **0 We do not tolerate forced or child labor**

Versova will not use or tolerate the use of forced, debt-bonded, indentured, enslaved person, or harmful child labor or human trafficking in its business or supply chain, nor will it knowingly accept products or services from suppliers that employ or utilize child or forced labor in any manner. This includes recruiting, harboring, transporting, providing, receiving, or obtaining a person's labor services through the use of force, fraud, coercion, or abduction for the purpose of involuntary servitude, peonage, debt bondage, or slavery.

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## **0 We believe in fair wages**

Versova will comply with all applicable compensation laws, including those related to minimum wage, working hours, rest periods, and overtime work.

## **We do not tolerate harassment**

One of Versova's core values is "Respect." All Versova employees are expected to treat their co-workers, as well as employees of our customers, suppliers, regulators, and contractors, with respect. As such, we will not tolerate any disrespectful or inappropriate behavior, physical or verbal abuse, or any other form of intimidation, unfair treatment, or retaliation of any kind. Sexual harassment or any unlawful harassment will not be tolerated.

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## **Safety and security are core values**

Versova is committed to providing a safe, clean, and secure environment for all personnel, poultry, eggs, egg products, and data and provides recurring safety training to our employees. We will comply with all applicable laws that govern the safety and health of our employees. We continuously strive to improve our efforts to prevent incidents and injuries in our workplaces.

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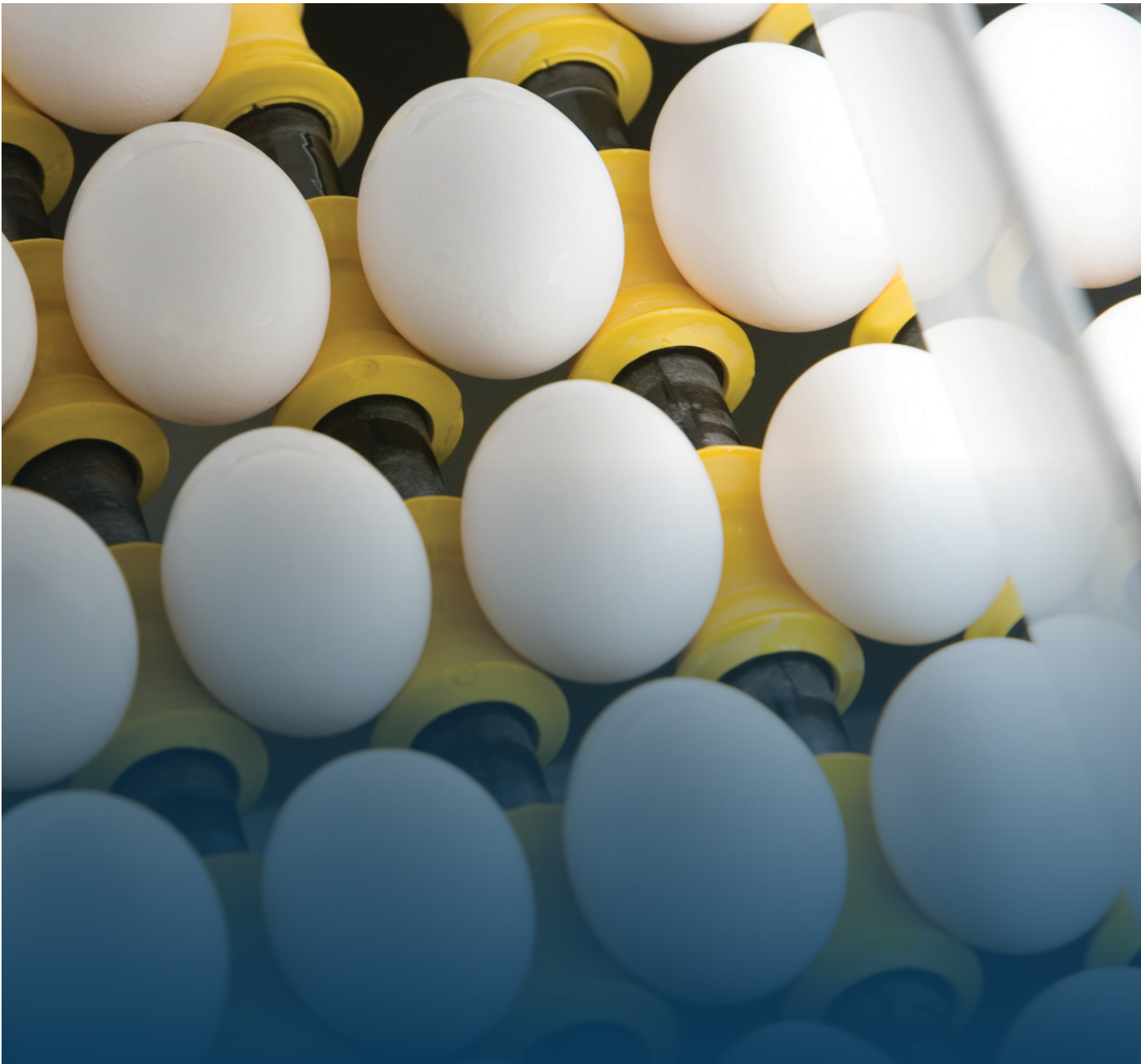
## **We do not tolerate workplace violence**

Versova is committed to providing its employees with a productive work environment that is free of intimidation, violence, and threats of violence. While no workplace can be free of minor disputes and disagreements, Versova will not tolerate any acts, or threatened acts of violence, by employees against fellow employees.

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## **We do not allow weapons at work**

Versova prohibits all persons who enter company buildings or property from possessing or using any weapon regardless of whether or not the person is licensed to carry the weapon. This includes handguns, firearms, explosives, knives which open with spring assistance or by an outward or downward movement and other articles or devices that are primarily used to inflict injury.



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